

1 A Maybe do it over a 70-mile stretch of land.

2 Q Well, that's just a question of wire --

3 MR. NAFTALIN: Okay, objection to this.

4 MR. ARONOWITZ: I'm just trying to get the
5 concept.

6 JUDGE STEINBERG: You have your testimony. The
7 testimony from Mr. Turro is that it can't be done.

8 MR. ARONOWITZ: Okay. No, there is testimony not
9 only that it can't be done, but more practically, that it
10 wasn't done. Whether it can be done or cannot be done, it
11 wasn't done.

12 MR. ARONOWITZ: Okay.

13 JUDGE STEINBERG: In the actual situation and fact
14 situation we have, it was -- that there was no signal in
15 Dumont -- that there would have been no signal in Dumont if
16 the transmitter in Monticello let's say blew up.

17 MR. ARONOWITZ: The only purpose -- the only
18 relevancy of these questions, Your Honor, is just to
19 basically show --

20 JUDGE STEINBERG: Yes, you want to show --

21 MR. ARONOWITZ: -- potential capabilities on these
22 equipment.

23 JUDGE STEINBERG: I know.

24 MR. ARONOWITZ: Mr. Turro is testifying.

25 JUDGE STEINBERG: You have his answers.

1 MR. ARONOWITZ: Okay.

2 JUDGE STEINBERG: And I know exactly what you are
3 trying to do, and I don't blame you for doing it because I
4 might do some of it myself later.

5 MR. ARONOWITZ: Good. Thank you.

6 BY MR. ARONOWITZ;

7 Q Now, you said that the transmitter in Monticello
8 never went down?

9 A This is true. Never lost carrier. Never went
10 completely off the air.

11 Q Okay. And just so I understand the configuration
12 of equipment, there was testimony that there was an
13 auxiliary generator there, some time an auxiliary generator
14 was installed at --

15 A Yes.

16 Q -- Monticello?

17 A Yes.

18 A And just so I understand what -- what would the
19 auxiliary generator do?

20 A The auxiliary generator would enable strictly the
21 WJUX facility to keep its transmitter on the air, audio
22 processing. It would keep the plant at WJUX operational;
23 not WVOS.

24 Q And that was it. Okay.

25 At some time after the auxiliary generator, and

1 we're about to start moving to the TC-8 remote units. At
2 the time that the generator was installed in Monticello, was
3 there a panel on the TC-8 that would reflect whether the
4 auxiliary was on or not?

5 A No.

6 Q Okay, good.

7 JUDGE STEINBERG: It would be a signal light, not
8 a channel; is that correct?

9 THE WITNESS: Your Honor, there was no indication
10 whatsoever from the generator to the remote control even to
11 this day whether the generator was running or not.

12 JUDGE STEINBERG: Okay.

13 BY MR. ARONOWITZ;

14 Q So if it would switch, it would just switch?

15 A Yes.

16 Q Okay. And when I say "switch," switch to the
17 generator is what I mean.

18 A Yes.

19 Q Which is, I think, what you understood. Okay.

20 I want to ask you another question -- let's move
21 over to the TC-8s. Can you follow us?

22 MR. NAFTALIN: There is a microphone down there.

23 MR. ARONOWITZ: Okay, don't break anything.

24 JUDGE STEINBERG: Okay, let's --

25 BY MR. ARONOWITZ;

1 Q Okay, now, as I understand this, from your
2 demonstration even earlier --

3 A Yes.

4 Q -- where you shorted out the circuit, status light
5 number four -- I think I'm using the correct terminology --
6 lit on both units. If I understand your testimony, the
7 short, the simulated short that caused these indicator
8 lights to light has now been moved. There is no longer a
9 short in the system.

10 A No.

11 Q And we are broadcasting, and we are operating --

12 JUDGE STEINBERG: The transmitter is on.

13 MR. ARONOWITZ: The transmitter is on.

14 THE WITNESS: Yes.

15 BY MR. ARONOWITZ;

16 Q We are operating substantially the same way we
17 were before the short.

18 A Yes.

19 Q But now indicator light number four remains on?

20 A Yes.

21 Q Okay. And I think in that-- the fact that number
22 four is on is -- you've told us that if one of these events
23 that is reflected in the status light occurs, the status
24 light remains on until somehow it's reset?

25 A In this case for Monticello, yes.

1 Q In this case for Monticello. Absolutely.

2 A Okay.

3 Q So say if -- in this case for Monticello, okay.

4 In this TC-8 box that is reflected to be in
5 Dumont, evidences what we would need in Dumont with respect
6 to the Monticello transmitters.

7 What were some of the other status lights on --

8 JUDGE STEINBERG: What would they represent?

9 BY MR. ARONOWITZ;

10 Q What would the other status lights represent?

11 A I will do my best to remember them. I can't
12 recall all of them.

13 Light number two would indicate an IPA overload at
14 the transmitter, which has never ever gone --

15 Q What's IPA?

16 A That means there is a problem inside the
17 transmitter. Intermitting power amplifier. It means one of
18 the stages went back in the transmitter.

19 I never ever went off as of this day.

20 Light number three, to the best of my
21 recollection, meant there was a plate voltage overload. In
22 other words, we normally run 1.1 amp. if it exceeded that
23 by maybe 1.3 - 1.4 amp, it would go off. I don't remember
24 ever, ever seeing that happen.

25 The popular light up there, the popular light to

1 go off up there was light number four, which is VSWR
2 problem.

3 Q Ice?

4 A I'm sorry.

5 Q Ice? Weather?

6 A Ice on the antenna. Not weather. Ice on it.

7 I don't -- it's entirely possible, Your Honor, I
8 don't really recall if there was status -- if the other
9 five, four lights did anything. I don't recall.

10 JUDGE STEINBERG: Did number one do anything,
11 represent anything?

12 THE WITNESS: It may have. I don't recall. It
13 was probably some sort of an overload light indication off
14 the transmitter. It may pop into my head later on this
15 afternoon. But it would be some sort of a transmitter
16 overload. I really don't remember.

17 MR. ARONOWITZ: Any more questions, Your Honor?

18 JUDGE STEINBERG: No, that's --

19 MR. ARONOWITZ: Oh, okay.

20 JUDGE STEINBERG: That's for you to determine.

21 MR. ARONOWITZ: I didn't want to interrupt you.

22 BY MR. ARONOWITZ;

23 Q And with respect to channels --

24 A Yes.

25 Q -- how many channels are there?

1 A Eight.

2 Q Eight channels. And unrelated to the lights?

3 A Absolutely unrelated.

4 Q Unrelated.

5 Do you recall what the channels were?

6 A Channel one, I think I've got to go back to what
7 you said.

8 Q Absolutely.

9 A Channel one would indicate power output, which
10 would be approximately 4,000 watts. Channel five, I
11 believe, show the outdoor temperature in Sullivan County.

12 Q And how would you read that?

13 A There is a box in what you see sitting here, as a
14 matter of fact, that had a little thermometer on it that ran
15 outside the building or hung outside the building, and that
16 would relay the information back to the remote control.

17 Q So if I understand you, to take the temperature up
18 there you would hit --

19 A And you do. Tap it to channel five.

20 Q No, no, no.

21 A Yeah, yeah, yeah, I'm not going to hurt you.

22 Q No, but I mean if --

23 A You go --

24 Q -- five, and then you would read the temperature?

25 A Yes.

1 Q Okay.

2 JUDGE STEINBERG: Where would the readout be?

3 THE WITNESS: Right here where you see all zeroes,
4 it would say 38 or 43 or 75, depending on what it was.

5 JUDGE STEINBERG: Okay, but the five, digital
6 readout of five would remain?

7 THE WITNESS: Yes.

8 JUDGE STEINBERG: Okay. It's a five and then
9 space, and then four zeroes, and the four zeros would --
10 where the four zeroes were it would tell you what the
11 temperature was?

12 THE WITNESS: It would tell you -- it would be
13 similar to 0073, meaning 73 degrees.

14 BY MR. ARONOWITZ;

15 Q Celsius, apparently.

16 A Yes.

17 Q All right, so we are up to five is temperature?

18 A Right.

19 Q Anything else?

20 A Oh, yes. Channel two -- now it's coming back to
21 me, because I don't do this that often. Channel one would
22 show you power output, approximately 4,000 watts.

23 Channel two would show you plate current, which
24 would be approximately 1.15 amps, approximately. I know Mr.
25 Barone will be doing math on this side to make sure we have

1 enough power.

2 The plate voltage would be approximately 5,500
3 volts.

4 JUDGE STEINBERG: That would be channel three?

5 THE WITNESS: Yes, sir, to the best of my
6 recollection here.

7 Channel four would show, and it wasn't very
8 accurate because it really wasn't properly calibrated, would
9 show VSWR -- the wattage coming back off the antenna. But
10 it --

11 MR. ARONOWITZ: No, go ahead.

12 THE WITNESS: Channel four would show another
13 status for the transmitter, and the readout.

14 BY MR. ARONOWITZ;

15 Q Of what?

16 A In other words, when you had this VSWR problem.

17 Q Right.

18 A And the wattage is coming back off the antenna.

19 Q Right.

20 A It could be 10 watts, it could be 30 watts, it
21 could be 50 watts, it could be anything, that would be
22 showing here. But it's important to understand it was never
23 properly calibrated. it was just like a guess.

24 Channel five showed temperature outside the
25 building. And I think that was about it. I don't recall

1 there being anything else tied onto that.

2 Q And when you were saying -- just again, and it's
3 been 20 years since I took the engineering for attorney's
4 course.

5 A You're doing fine.

6 Q When you were talking about plate voltage and
7 wattage and so on and so forth, this would enable you to
8 take meter readings, not adjustments, but readings of the
9 Monticello --

10 A Me personally, yes.

11 Q You personally, but nobody else?

12 A No one else could know what they meant.

13 Q Okay. And did you ever take those readings with
14 this box?

15 A I may have occasionally.

16 Q Would there be another way to take readings?

17 A At the transmitter.

18 Q Okay, okay.

19 A Oh, I'm sorry.

20 Another way would be dial up remote control.

21 Q Right. I think we can assume the dial up is in
22 place and I think we are all -- I don't see any merit for
23 further discussion of the dial up. I think we all accept
24 that.

25 JUDGE STEINBERG: Just ask the next question.

1 MR. ARONOWITZ: Okay. Okay.

2 BY MR. ARONOWITZ;

3 Q Now, as you were taking us through the channels
4 and you were saying you were having some -- various things
5 were coming back to you. When you set these -- when did you
6 obtain these pieces of equipment?

7 JUDGE STEINBERG: The ones in use in Dumont?

8 MR. ARONOWITZ: The ones in Dumont --

9 THE WITNESS: Mr. Weis obtained them --

10 MR. ARONOWITZ: -- and in Monticello.

11 THE WITNESS: -- in October.

12 JUDGE STEINBERG: Wait. Only one person talk at a
13 time, please.

14 THE WITNESS: I'm sorry.

15 I believe they were obtained some time in October
16 of '94, approximately.

17 BY MR. ARONOWITZ;

18 Q And did you install them?

19 A Yes.

20 Q Okay.

21 A Actually, I take that back. I did not install
22 them. Mr. Weis's people installed them. I calibrated them.

23 Q Right, you calibrated them?

24 A Right.

25 Q And when you say "calibrate" --

1 A Yes.

2 Q -- you mean you set them up?

3 A No, I didn't say that.

4 Q All right, go ahead. What do you mean by
5 "calibrate"?

6 A What happens is I would turn the transmitter on
7 and the transmitter would read 4,000 watt output, and what I
8 would do is I would make sure that channel one had read
9 4,000 watts. I would go to plate voltage, it was reading
10 5,500 watts. I would make sure that I calibrated the remote
11 control to read the same. I mean, that's basically what I
12 did.

13 Q So you calibrated -- for those of us who have
14 gotten radar tickets, I think, understand the concept of
15 calibration.

16 A Okay, you got it.

17 Q I personally didn't get one, but --

18 JUDGE STEINBERG: Okay, let's go to the next
19 question.

20 BY MR. ARONOWITZ;

21 Q The channels, all right, which this channel
22 button, the white channel button, as you hit the channel and
23 it switches the channel, in the configuration that you had I
24 see a button with an up and a down.

25 A Right.

1 Q Did that have any purpose in this unit?

2 A The only purpose --

3 Q As configured?

4 A As configured, the only purpose it would have
5 would be in channel one, and that would be to turn the
6 transmitter on and off.

7 Q Okay. Did you install -- did you install -- and
8 I'm going to just try -- inputs to the various channels?

9 I mean, in other words, were you the one that
10 installed one to be the whatever it was, and five to be the
11 weather and four to be -- or two to be the plate voltage?
12 Did you establish what the channels were?

13 A I don't remember.

14 Q Do you know if anybody else might have?

15 A Mr. Weis had some folks up there doing some work.
16 I really -- I may have. I really don't remember.

17 Q Okay. Well, if you didn't, you had to somehow
18 acquire knowledge of what all the channels meant.

19 A Oh, yeah.

20 Q Okay.

21 A It's tagged up there. It's labeled by the
22 transmitter.

23 Q What do you mean "labeled"? Do you refer to the
24 little areas next to the status lights where I see a spot
25 where one presumably could write something in?

1 A I think there was -- again, I haven't been up
2 there in such a long time. I can't remember everything.

3 Q Well, this is the Dumont one I'm talking about.

4 A I'm sorry. I'm sorry.

5 Give it to me -- I'm sorry. Would you ask me the
6 question again?

7 Q Did you install the channels for the TC-8 remote
8 in Dumont? In other words, were you the one that decided
9 one was whatever it was, or five was temperature, and two
10 was plate voltage?

11 A It's -- you can't configure it in Dumont. You
12 have to configure it at the transmitter. It was configured
13 at the transmitter, and I had a copy of it that I rewrote
14 and retyped, and to this day hangs at Dumont studios saying
15 what channel does what, yes. For that particular unit in
16 Dumont to Monticello, yes.

17 Q So if you set the channels here --

18 JUDGE STEINBERG: "Here" being at the transmitter?

19 BY MR. ARONOWITZ;

20 Q At the -- at the TC-8 remote control located at
21 the transmitter, if they were set by someone.

22 A Right.

23 Q This would define what the channels were on the
24 TC-8 remote --

25 A In Dumont.

1 Q -- in Dumont?

2 A Yes.

3 Q In other words, if this -- if five on this was
4 temperature, five on this would be temperature?

5 A Yes.

6 Q And it would be set from Monticello, from the
7 transmitter?

8 A Set? Yes.

9 Q Okay, I'm getting there. I'm getting -- I think
10 I'm --

11 MR. NAFTALIN: We need to characterize whatever
12 "this" is.

13 MR. ARONOWITZ: Oh, I thought this --

14 MR. NAFTALIN: Well, you are pointing, and the
15 recorder can't pick it up.

16 MR. ARONOWITZ: I thought I said Monticello.
17 Okay. For the record --

18 JUDGE STEINBERG: Whatever five was at the
19 transmitter, it was the same in Dumont?

20 THE WITNESS: Yes.

21 JUDGE STEINBERG: And you couldn't change that?
22 You couldn't make --

23 THE WITNESS: You couldn't change it from Dumont,
24 not.

25 JUDGE STEINBERG: You couldn't change it from

1 Dumont. You would have to change it at the transmitter. So
2 if five was outdoor temperature, and for some reason you
3 decided, gee, I want eight to be outdoor temperature, and
4 you went to the transmitter and you hooked up the
5 temperature gizmo to number eight, then eight in Dumont
6 would be temperature?

7 THE WITNESS: Yes.

8 JUDGE STEINBERG: And five would be nothing?

9 THE WITNESS: Yes.

10 BY MR. ARONOWITZ;

11 Q And are you aware of whether the configuration,
12 whether the channel designations changed at any time?

13 In other words, was five temperature from day one?

14 A Yes.

15 Q So that the status lights and the channel lights
16 did not change from the time they were installed, which I
17 think you said was approximately fall of '94?

18 A We are mixing apples and oranges here.

19 Just because channel five read -- okay, just
20 because channel five read temperature, it had nothing
21 whatsoever to do with the status light.

22 This box has three --

23 Q I understand.

24 A Okay, okay.

25 Q I'm asking if either the status lights or the

1 channel designations, in other words, the way you set these
2 TC-8 remote units.

3 A Yes.

4 Q Did they change at all between fall of '94 and let
5 us say fall of '95?

6 A Yes.

7 Q They did change?

8 A One of them changed.

9 Q One what changed?

10 A Channel five changed.

11 Q Okay. What did channel five become?

12 A It became nothing. There was a -- that was the
13 temperature outside at Monticello. When the facility got
14 hit by lightening in April of '95, the probe outside the
15 building to hit by lightening also and ceased to function,
16 so channel five became a blank. It doesn't work and hasn't
17 worked since.

18 Q And did you make that change?

19 JUDGE STEINBERG: The lightening did, I think.

20 THE WITNESS: Yeah.

21 MR. ARONOWITZ: Okay. I'm doing the best I can.

22 THE WITNESS: You're doing fine.

23 MR. ARONOWITZ: Okay.

24 BY MR. ARONOWITZ;

25 Q Now, this interactive -- we have on here -- all

1 right. I believe you said that even though we have this
2 situation here, that the channels could not be changed in
3 Dumont without first pressing another button.

4 A I didn't way that.

5 JUDGE STEINBERG: No, he didn't say that. He said
6 you can't turn the transmitter on or off without pressing
7 two buttons.

8 Let me ask Mr. Turro, did you have to press both
9 buttons simultaneously or could you press one, take your
10 finger off that one, and then press the other?

11 THE WITNESS: No, they both had to be pressed at
12 the same time, Your Honor.

13 BY MR. ARONOWITZ;

14 Q And was that -- was that set up installed from day
15 one?

16 A Yes.

17 Q Okay. And so the button only did transmitter on
18 and off?

19 JUDGE STEINBERG: Which button?

20 MR. ARONOWITZ; The secondary button had relation
21 to.

22 JUDGE STEINBERG: You have a button on the TC-8.
23 You're not talking about that, Mr. Aronowitz? You're
24 talking about the second button you had to push. And the
25 question is what other functions, if any, did that second

1 button have?

2 THE WITNESS: It gave you -- I'll explain this
3 clear. I'll give you -- there is only one example of it.
4 You have to be in channel one, you would have to say, "I
5 want to turn the transmitter on. I want to turn the
6 transmitter off." That's the only function that you can do
7 up there.

8 You would go to channel one, you would hit the
9 down button, at the same time hold the button on top to make
10 the circuit.

11 JUDGE STEINBERG: The second button?

12 THE WITNESS: Yes, sir.

13 BY MR. ARONOWITZ;

14 Q So you didn't need to do the circuit button to
15 take a plate voltage reading or anything like that?

16 A No.

17 Q Okay.

18 MR. ARONOWITZ: One moment.

19 (Pause.)

20 BY MR. ARONOWITZ;

21 Q Did these units ever need tweaking?

22 A No.

23 Q Okay. So they were set; that was it?

24 A Yes.

25 Q There's nothing, lightening strikes or anything

1 like that didn't occasion the need to manipulate any of this
2 equipment?

3 A None that I recall.

4 Q Okay. And when you say this was labeled, this had
5 some --

6 JUDGE STEINBERG: "This" being the Dumont --

7 BY MR. ARONOWITZ;

8 Q The TC-8 unit in Dumont had a little key that let
9 you know what the -- did it let you know what the channel
10 strip for --

11 A Yes.

12 Q Was there one that let you know what the indicator
13 lights --

14 A Yes.

15 Q So there were two keys.

16 A As a matter of fact, it's still there to this day.
17 When the FCC inspected, it was hanging in a plastic envelope
18 with a little piece of wire on it hanging from the rack, and
19 to this day it's still there. It hangs from the rack.

20 JUDGE STEINBERG: It's just one --

21 THE WITNESS: One sheet, Your Honor.

22 JUDGE STEINBERG: One sheet showing what the
23 status lights mean and one sheet showing what the -- the key
24 for the channel?

25 THE WITNESS: Yes, sir.

1 BY MR. ARONOWITZ;

2 Q All right. When you say that the strobe light
3 never worked properly from day one.

4 A Yes.

5 Q Did it sometimes go off accidentally?

6 A Yes.

7 Incorrectly would be a better word. I don't know
8 about accidentally, but incorrectly probably defines --

9 Q Spontaneously?

10 A Yes.

11 Q Nothing would happen, and it would just all of a
12 sudden strobe off?

13 A Yes.

14 Q Were there times that it might have -- okay, I
15 guess the converse to that question is could something have
16 happened other than the 56 kb circuit data path going down
17 that would cause the strobe light to illuminate?

18 A No.

19 Q What did you just do?

20 A I took the power off to see if the power off would
21 make it light up. No.

22 JUDGE STEINBERG: Okay, what Mr. Turro did is he
23 shut off the power to the TC-8 unit at Dumont, and when he
24 returned -- when he turned the power back on, the strobe
25 light went off, flashed once.

1 MR. ARONOWITZ: One moment, Your Honor.

2 (Pause.)

3 MR. ARONOWITZ: I don't believe I have anymore,
4 Your Honor.

5 JUDGE STEINBERG: Mr. Helmick?

6 MR. HELMICK: I have just one question, Your
7 Honor.

8 CROSS-EXAMINATION

9 BY MR. HELMICK:

10 Q Mr. Turro, would it be fair for understanding this
11 that the status lights are an indicator that there is some
12 type of problem?

13 A In this particular case, yes.

14 Q And the channel lights would be function lights
15 unrelated to the channel lights?

16 A I'm sorry?

17 Q The channel does -- each channel does something
18 distinctly unrelated to whether or not there is a problem?

19 JUDGE STEINBERG: Oh, you know what the problem
20 was? Mr. Turro got confused because he said "the channel
21 lights were function lights unrelated to the channel." You
22 mean to say the channel lights were function lights
23 unrelated to the status lights. I think you used "channels"
24 in your question twice, and I think that caused confusion.

25 MR. HELMICK: All right.

1 JUDGE STEINBERG: So you might want to rephrase
2 it.

3 MR. HELMICK: Let me restate it.

4 JUDGE STEINBERG: Because I think that was the
5 source of the problem.

6 MR. HELMICK: Let me restate it.

7 BY MR. HELMICK:

8 Q The channel lights represent -- the channels
9 rather, not the lights, the channels represent different
10 functions that are performed on each channel?

11 A Yes.

12 Q And the status lights represent --- they are an
13 indication that there is a problem unrelated to the channel?

14 A Correct.

15 Q Now, when you were recalling for Mr. Aronowitz
16 what the different channels represented, I believe you
17 stated that channel four indicated that was a VSWR. I think
18 that's what you stated.

19 A Okay, if I said that, I apologize. I get confused
20 too, you know, even though I know this very well. If I said
21 channel four, I meant light number four.

22 Q What does channel four do? What function is
23 channel four? I just want to clear it up, if you know.

24 A Channel one is power output. Channel two is plate
25 voltage. Channel three is plate current. I don't think

1 there was a function on channel four. I don't recall. And
2 if I said something, tell me. I'll remember. Channel five
3 was temperature. And that was about it.

4 JUDGE STEINBERG: You may have said channel four
5 was another status of the transmitter, a light indicating
6 some other status of the transmitter. But that was after
7 you talked about the VSWR wattage coming back.

8 THE WITNESS: Thank you, Your Honor, for
9 refreshing my memory. I apologize.

10 Channel four indicated VSWR from the antenna.
11 That's what -- channel four, in this particular case, Mr.
12 Helmick, light number four at channel four are related. The
13 light comes on, you know to go to channel four and see
14 what's going on.

15 MR. HELMICK: That's what I wanted to hear.

16 THE WITNESS: Okay.

17 MR. HELMICK: That's what I thought you said.

18 THE WITNESS: That's what I want to tell you.

19 BY MR. HELMICK:

20 Q In this one particular instance light number four
21 and channel number four were related?

22 A In this case, yes, sir.

23 Q All right.

24 MR. HELMICK: That's all I have, Your Honor.

25 JUDGE STEINBERG: Mr. Riley?

1 MR. RILEY: Yes, I have a question.

2 CROSS-EXAMINATION

3 BY MR. RILEY:

4 Q Mr. Turro, you indicated that in Dumont it would
5 be known that the transmitter for WJUX had ceased to
6 function because the Fort Lee translator, which you
7 monitored, would lose -- wouldn't be broadcasting any
8 programs?

9 A That is correct.

10 Q Now, if you were set on channel one on your Dumont
11 TC-8 --

12 A Yes.

13 Q -- and you heard the Fort Lee translator stop
14 broadcasting, could you not look at that and see those four
15 digits on the right of the channel numbers showing zero?
16 Wouldn't it show that there was no power at the WX/JUX
17 transmitter?

18 A That's never happened.

19 Q I --

20 A Oh, I'm sorry.

21 A I'm asking you about the capability of the TC-8.

22 A Okay. So if the transmitter ever went off, would
23 this be showing all zeroes?

24 Q Yes.

25 A Yes.